



# CITY of KOKOMO

[www.cityofkokomo.org](http://www.cityofkokomo.org)

**GREG GOODNIGHT, MAYOR**

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Kokomo, Indiana 46901  
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(765) 456-7444

January 22, 2014

Mr. Don West  
Environmental Management Support, Inc.  
8601 Georgia Avenue, Suite 500  
Silver Spring, MD 20910

Re: FY2014 Brownfields Grant Proposal  
\$1,000,000 U.S. EPA Brownfields Hazardous Substances  
Revolving Loan Fund (RLF) Grant  
Kokomo, Indiana

Dear Mr. West:

The City of Kokomo (the City) is submitting the enclosed application for an EPA RLF Grant in the amount of \$1,000,000 for hazardous substances.

The City is located in central Indiana, approximately 60 miles north of Indianapolis, along U.S. Highway 31 (US-31), one of the major north-south highways in Indiana. The City encompasses an approximately 18 square-mile area that is bordered by farmland. In the early 1900s, natural gas was discovered in Kokomo, beginning the City's industrial age. Ranging from the first American car in 1894, to the first stainless steel in 1912, and the first transistor car radio in 1957, the City has long been a hub of innovative industrial activity. During this time, large-scale manufacturing operations sprang up throughout the City, employing thousands of residents and creating a thriving community. By 2000, competition from overseas markets began to take a bite out of the manufacturing sector, but residents and leaders felt confident the area could weather the change. As the Chrysler and General Motors (GM) bankruptcies unfolded in 2008/2009, unemployment shot up to 20.6% (*Bureau of Labor Statistics, Local Area Unemployment Statistics, 2009*). Although the community has somewhat recovered from the recent recession, hundreds of acres of brownfields continue to sit unused and falling into disarray across the City.

The City is now facing the challenge of revitalizing portions of the City where brownfields have impacted and continue to impact the health and welfare of its residents and its natural resources and waterways. The large areas of brownfields and associated available commercial/industrial space within the City are the raw materials for sustainable/equitable development/redevelopment with mixed-use developments, high-tech manufacturing, and community amenities. The City has a functioning brownfields program that has successfully used Assessment Grant funds to support the initial assessment of many commercial and industrial sites throughout the City. The City now needs RLF grant funds to support the cleanup (chemical contamination and asbestos

abatement) of its priority industrial sites located in targeted communities/areas with high numbers of impoverished, minority, and sensitive populations.

Kokomo is coming out of the local recession created by the closure of multiple large automotive facilities as well as the national recession, but it still faces dismal fiscal and employment conditions and its minority and sensitive populations are bearing the brunt of the health and welfare impacts of the numerous brownfields that dominate the City's landscape. With RLF funds, the City can support the cleanup and redevelopment of these brownfields, allowing the City to capitalize on its rich history of innovation and reinvent itself as a new urban community with opportunities for all of its citizens.

The following applicant information is provided as part of the Grant Application:

- a. Applicant Identification: City of Kokomo  
100 South Union Street  
Kokomo, Indiana 46901
- b. Dun and Bradstreet (DUNS): 047216288
- c. Funding Requested:
  - (i) Grant type: RLF
  - (ii) Federal Funds Requested: \$1,000,000
  - (iii) Contamination: Hazardous Substances
- d. Location: City of Kokomo, Howard County, Indiana
- e. Contacts:
  - (i) **Project Director:** Mr. Paul Allor  
Department of Development, Development Specialist  
100 South Union Street, Kokomo, Indiana 46901  
Phone: (765) 456-7375, email: [pallor@cityofkokomo.org](mailto:pallor@cityofkokomo.org)
  - (ii) **Chief Executive:** Mr. Greg Goodnight, Mayor  
City of Kokomo  
100 South Union Street, Kokomo, Indiana 46901  
Phone: (765) 456-7444, email: [mayor@cityofkokomo.org](mailto:mayor@cityofkokomo.org)
- f. Date Submitted: January 22, 2014
- g. Project Period: Five years
- h. Population: 45,468 (*U.S. Census Bureau 2010*)
- i. Special Considerations Checklist: Attached

Very truly yours,



Mr. Paul Allor  
Department of Development  
Development Specialist  
City of Kokomo, Indiana

**FY2014 U.S. EPA BROWNFIELDS HAZARDOUS SUBSTANCES REVOLVING LOAN FUND  
GRANT APPLICATION  
CITY OF KOKOMO, INDIANA**

**RANKING CRITERIA FOR REVOLVING LOAN FUND (RLF) GRANTS**

**1. Community Need:**

**a. Targeted Community and Brownfields:**

**(i) Target Community Description:** The City of Kokomo (the City) is located in central Indiana, approximately 60 miles north of Indianapolis. The City is located along U.S. Highway 31, one of the major north-south highways in Indiana, and encompasses an approximately 18 square-mile area that is bordered by farmland. Kokomo was at the front line of the collapse of the American automotive industry. With the bankruptcy of Chrysler, General Motors (GM), and their suppliers in 2009, hundreds of acres of vacant factories now dominate the landscape, and community leaders are struggling to clean up the environmental fallout, improve health and welfare of the residents, and return employment opportunities to citizens. Although brownfields are scattered throughout Kokomo, the City's focus is on the brownfields in three targeted communities/areas: (1) the downtown district (historical downtown area), (2) Central Kokomo (residential area south of downtown Kokomo), and (3) Technology Park area (former industrial area between two rail lines in Kokomo). Priority sites in these targeted communities/areas (Section 1.a.(iii)) have soil and groundwater impacted by numerous contaminants, which pose a health threat to nearby sensitive populations. The City started a brownfields program and now it needs funds to support the cleanup of these sites to bring them back into safe, productive use.

**(ii) Demographic Information:** The demographics and economic effects of brownfields on the City as well as the targeted communities/areas are discussed in Section 1.c.(ii).

	<u>Kokomo</u>	<u>Howard County</u>	<u>Indiana</u>	<u>U.S.</u>
Population	45,468 <sup>1</sup>	82,752 <sup>1</sup>	6,483,802 <sup>1</sup>	308,745,538 <sup>1</sup>
Unemployment	8.4% <sup>4</sup>	7.8% <sup>2</sup>	7.0% <sup>2</sup>	7.0% <sup>2</sup>
Poverty Rate	19.9% <sup>3</sup>	16.0% <sup>3</sup>	14.7% <sup>3</sup>	14.9% <sup>3</sup>
Percent Minority	16.5 <sup>1</sup>	11.4% <sup>1</sup>	15.7% <sup>1</sup>	27.6% <sup>1</sup>
Median Household Income	\$37,300 <sup>3</sup>	\$44,452 <sup>3</sup>	\$48,374 <sup>3</sup>	\$53,046 <sup>3</sup>
Per Capita Income	\$21,270 <sup>3</sup>	\$23,723 <sup>3</sup>	\$24,558 <sup>3</sup>	\$28,051 <sup>3</sup>
<u>Targeted Community/Area</u>	<u>Downtown District</u>	<u>Central Kokomo</u>	<u>Technology Park</u>	
Percent Minority/Percent AA	53.0% <sup>1</sup>	12.5% <sup>1</sup>	16.5% <sup>1</sup>	
Poverty Rate	30.3% <sup>3</sup>	33.0% <sup>3</sup>	38.0% <sup>3</sup>	
Per Capita Income	\$14,544 <sup>3</sup>	14,946 <sup>3</sup>	\$11,519 <sup>3</sup>	
Food Stamps/SNAP	30.9% <sup>3</sup>	24.7% <sup>3</sup>	31.5% <sup>3</sup>	
Under 5 Years (U.S.:6.5% <sup>1</sup> )	7.0% <sup>1</sup>	8.8% <sup>1</sup>	8.3% <sup>1</sup>	
Women of Childbearing Age <sup>5</sup> (U.S.:14.8% <sup>1</sup> )	16.1% <sup>1</sup>	18.7% <sup>1</sup>	17.9% <sup>1</sup>	

<sup>1</sup> Data from 2010 U.S. Census and is available at [www.census.gov](http://www.census.gov)  
<sup>2</sup> Data from Bureau of Labor Statistics (October 2013-not seasonally adj) and is available at [www.bls.gov](http://www.bls.gov)  
<sup>3</sup> Data from 2008-2012 American Community Survey and is available at [factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml](http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml)  
<sup>5</sup> Women aged 20 to 44; AA = African American; CT = Census Tract

**(iii) Brownfields:** The City's overriding concern is the sheer number of brownfields located throughout Kokomo. The Indiana Department of Environmental Management (IDEM) identified over 90 sites with known environmental contamination (hazardous substances and petroleum) and over 150 sites (industrial waste sites, dump sites, manufactured gas plants, landfills, underground storage tank sites, etc.) that are likely contaminated in the City. Based on a reconnaissance of the major roadways within the City, 100 more potential brownfields (gasoline stations, automotive repair/sales, dry cleaners, machine shops, auto body shops, and manufacturing plants) were identified. This includes the 150 acres of former GM and Delphi plants that closed or downsized in the past ten years, which are not included in the group of GM properties currently being cleaned up and marketed. The following five, priority sites located in the targeted areas illustrate typical past uses, contaminants, current conditions, and health threats



posed by brownfields. Soil and groundwater impact is present at each of these priority brownfields and likely present at most of the hundreds of other brownfields in the City. Due

<u>Targeted Area, Priority Sites, and Past Uses</u>	<u>Environmental Concerns/Contaminants</u>	<u>Current Conditions</u>
<b>DOWNTOWN DISTRICT (CENSUS TRACT 2)</b> <b>Button Motors</b> (vehicle repair, filling station, dry cleaner - 6 acres)  <b>Apperson Way</b> (circuit manufacturer/electroplating/gasoline station/urban fill – 2.5 acre)	metals, polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs), chlorinated solvents  lead, zinc, phosphates, cyanide, methyl ethyl ketone	vacant lot  vacant building and church
<b>Health:</b> headaches, respiratory problems, nerve damage, liver/kidney damage, impaired fetal development, birth defects <b>Sensitive receptors:</b> Impoverished minority residential neighborhood, 500 feet from Central Middle School and its athletic fields, and 500 feet from YMCA and YWCA		
<b>CENTRAL KOKOMO (CENSUS TRACT 9)</b> <b>NISCO</b> (metal manufacturing – 1.5 acres)  <b>Former Lumber Yard/Cabot</b> (former quarry used for hazardous and radioactive material waste dumping) (6 acres)	heavy metals, lead, chlorinated solvents, PAHs, VOCs,  arsenic, copper, chromium, pentachlorophenol, cobalt-60, uranium-234/235/238	vacant unsecured land and derelict buildings
<b>Health:</b> cancer, cell damage, lowered white blood cell count, headaches, poor coordination, respiratory problems, nerve damage, liver/kidney damage, impaired fetal development <b>Sensitive receptors:</b> Impoverished residential neighborhood with high numbers of children under five and women of child-bearing age, along Wildcat Creek, and near public trail		
<b>TECHNOLOGY PARK (CENSUS TRACT 12)</b> <b>Delphi</b> (auto parts manufacturer – 15 acres)	lead, VOCs, PAHs	vacant land
<b>Health:</b> respiratory problems, anemia/bone marrow problems, nerve damage, liver/kidney damage, impaired fetal development, birth defects <b>Sensitive receptors:</b> Impoverished residential neighborhood with high numbers of children under five and women of child-bearing age, 500 feet from preschool and church		

to the unsecured condition of the sites and the deteriorated buildings on them, it is possible for residents (especially children) to access the sites and the structures. Once on-site, they may be exposed to asbestos fibers (known to cause mesothelioma and asbestosis), lead-based paints/lead-laden dust (known to cause neurological damage in children), and surficial soil contamination. In addition to the real environmental concerns on these sites, the perception of many residents and businesses is that these sites cannot be safely redeveloped; therefore, these sites, sit unused and falling further into disarray and decay.

**(iv) Cumulative Environmental Issues:** Kokomo was a hub for automotive manufacturing and its neighborhoods developed around Kokomo/Continental Steel plants, Amoco oil refinery, manufactured gas plants, bulk oil distribution facilities, stone quarries, Haynes metal alloy manufacturing sites, metal scrap operations, and numerous foundries and plating operations associated with the over 150 acres of automotive facilities. Two regional airports are located on the outskirts of the City and two open dumps, two waste transfer stations, a wastewater treatment plant, and 23 industrial waste generators are located in City limits. Three rail lines (two active, one abandoned) intersect in central Kokomo, resulting in most neighborhoods being bisected by rail lines and rail yards. In addition, U.S. Highway 31 traverses the entire eastern side of the City. Each of these sources have contributed to local air pollution and aesthetic (odor and visibility) concerns. The U.S. EPA AirData County Emissions Report indicates that the large industrial plants in Kokomo, quarries, area landfills, and vehicle traffic on U.S. Highway 31 have historically released millions of pounds of air pollutants. The City is also listed as a Zone 1 area for radon, having the highest potential for elevated indoor radon levels, which is known to cause lung cancer. Now that many of the listed facilities are closed, emissions are lower but neighboring residents have already been exposed to numerous airborne contaminants and are



continuing to be exposed to residual contaminants via airborne particulate and vapor intrusion inhalation pathways as well as by contaminated particulate ingestion. As discussed in Section 1.b, health impacts from environmental pollutants are greater for the City's low income and minority populations, who are more likely to live near current and former industrial operations, illustrating the disproportionate cumulative impact of industrial operations and their subsequent brownfields, representing environmental justice concerns.

**b. Impacts on Targeted Community:** The City has a high number of impoverished, minority, and sensitive populations who disproportionately live in the targeted communities/areas (Section 1.a(ii)) near brownfields and, as demonstrated below, continue to bear the brunt of exposures to environmental pollutants associated with working in and living near current and former industrial operations. These areas also have higher numbers of children and woman who may become pregnant (i.e., child-bearing age). The contaminants found on the priority sites are known to cause cancer, cell damage, respiratory problems, nerve/liver damage, and impair fetal development/cause birth defects (mutagens/teratogens) (Section 1.a(iii)). Due to the proximity of current and former manufacturing plants to low-income neighborhoods, parks, and schools in the targeted communities, it is likely that children, pregnant women, and the elderly in these impoverished neighborhoods have been exposed to brownfields' air pollutants and contaminated groundwater, which have played a pivotal role in the elevated cancer and infant mortality rates in the community (see following table). Residents in Howard County (no City data available) have higher total cancer and lung/bronchus cancer rates (per 100,000) and infant mortality rates (per 1,000 live births) than both Indiana and the U.S. Asthma rates for the County (no City data available) were estimated based on state rates and not on actual County data; therefore, the

	<b>Cancer Incidence Rate</b> (per 100,000)	<b>Lung/Bronchus Cancer Incidence</b> (per 100,000)	<b>Infant Mortality Rate</b> (per 1,000 live births)
U.S.	471.8 <sup>1</sup>	68 <sup>2</sup>	6.8 <sup>3</sup>
Indiana	475.6 <sup>1</sup>	79 <sup>2</sup>	7.55 <sup>4</sup>
Howard County	499.8 <sup>1</sup>	88 <sup>2</sup>	8.84 <sup>4</sup>

<sup>1</sup>Indiana State Department of Health, *Indiana Cancer Facts and Figures, 2012*; <sup>2</sup>CDC, *National Cancer Institute*

<sup>3</sup>U.S. Census Bureau, *Statistical Abstract of the United States, Table 116, 201*; <sup>4</sup>Indiana State Department of Health, *Epidemiology Resource Center, Indiana Mortality Report, 2007*

rates of asthma for sensitive populations in the City are unknown. However, the County has the 15<sup>th</sup> highest hospitalization rate for asthma in Indiana (92 counties total) and is in the top 25 counties for asthma Emergency Room visits (*The Burden of Asthma in Indiana, 2011*). These health concerns are worse for minority populations. The Indiana State Department of Health found that asthma prevalence in Indiana is higher among females, African Americans, and adults with an annual household income less than \$15,000 (*The Burden of Asthma in Indiana, 2011*). Additionally, African Americans cancer incidence rates are 5% to 51.4% greater than whites, and their cancer mortality rates are 11.7% to 108.4% greater than whites (*Indiana Cancer Facts and Figures 2012, Indiana Cancer Consortium*). This demonstrates the disproportionate impacts from industrial operations and brownfields to minority and low-income residents. To make matters worse, impoverished and minority populations also often suffer from additional health concerns (poor nutrition and lack of access to adequate health care) which intensify brownfields health concerns. The U.S. Department of Agriculture Economic Research Service indicates that the low-income neighborhoods on the northern and southern portions of the City (includes the Central Kokomo and Technology Park areas) are Urban Food Deserts (i.e., access to supermarkets is limited) (*USDA Food Access Research Atlas*). In the City, 15.7% of the population does not have health insurance (22.9% to 28.2% in the targeted communities/areas) (*2008-2012 American Community Survey 5-year Estimates*). It is likely that exposure to environmental pollutants (cumulatively from brownfields and the sources discussed in Section 1.a(iv)) have aggravated these public health concerns, especially for the impoverished, minority, and sensitive populations who disproportionately live near pollutant sources.

The second health and welfare concern is migration of contaminants from brownfields to Wildcat Creek, which runs through the center of the City. Wildcat Creek continues to be impacted by stormwater run-off from the over 50 known contaminated sites that are located



within a one-mile radius of the creek. The run-off presents a threat to the water quality (dissolved oxygen, toxicity, etc.) and sediments of the creek. Contamination also poses a threat (via direct contact and ingestion) to underprivileged children who play in and around the creek because they do not have access to other affordable recreational opportunities.

**c. Financial Need:**

**(i) Economic Conditions:** Kokomo's economic success was linked to that of GM, Chrysler, and Delphi. By June 2009, GM, Chrysler, and Delphi had filed for bankruptcy, resulting in the final closure or downsizing of five plants, an approximately 34% decrease in the number of motor vehicle parts manufacturing jobs in one year (*Bureau of Labor Statistics, Quarterly Census of Employment and Wages, 2008 and 2009*), and unemployment reaching a peak of 20.6% (*Bureau of Labor Statistics, Local Area Unemployment Statistics, Howard County, 2009*). It is worth noting that overall manufacturing employment had already decreased by over 20% between 2000 and 2008. This massive job loss decimated the City's tax base with property tax revenues across the County decreasing by approximately 28% between 2008 and 2012 (*2012 Property Tax Report, Howard County*), and per capita income decreasing by 6.5% between 2000 and 2012, when adjusted for inflation (*STATS Indiana, Side-by-Side Profiles*). This decrease in available operating revenue has resulted in a City operating budget that is at 2004 levels and an approximately 20% reduction in the City workforce. Because operational budgets for vital municipal services (fire, police, waste management, etc.) must be preserved, the City has been forced to divert funding from redevelopment. The City has developed a brownfields program based on its current EPA Assessment Grant (Section 5.c) but it has no funds with which to conduct environmental cleanup of brownfields. Until the hundreds of acres of brownfields are redeveloped with viable businesses and housing, there will be no significant increase in the City's tax base and its dismal fiscal conditions will not improve.

**(ii) Economic Impacts of Brownfields:** As shown in Section 1.a.(ii), poverty rates in Kokomo are over two times those of the U.S., and median household incomes and per capita incomes are nearly half the national average. As the quantity and quality of jobs in Kokomo have decreased, more affluent residents have left the City, leaving minority-populated, poverty stricken neighborhoods in the targeted communities/areas. In these areas, there are minority neighborhoods (50% minority) where nearly 40% of the population lives below the poverty line and 25%-30% of the population receives public assistance. The presence of priority sites (Section 1.a.(iii)) and other vacant brownfields in these neighborhoods exacerbates the problem by decreasing property values (median home values in the targeted communities/areas range from \$47,000 to \$64,900, three to four times lower than the U.S. median value of \$181,400 (*2008-2012 American Community Survey*)), and inhibiting the growth of the residents' assets, resulting in disinvestment by residents and businesses. This is an example of environmental injustice made worse because impoverished residents impacted by brownfields' pollutants can't afford to move away from the brownfields. In addition to the environmental justice concerns, since 2009, more and more industrial operations have closed and the total assessed value of property in the County has fallen by over 13% (*2010 and 2012 Property Tax Reports, Howard County*). With a current foreclosure rate of 6.0% (21.1% for subprime loans (*foreclosure-response.org*)), vacancy rates in the targeted areas have reached 18.7% to 25.2% (*2008-2012 American Community Survey*). Compounding this problem, the City must secure unsafe buildings and maintain under-utilized municipal services for these blighted, high-vacancy areas where the tax base is not sufficient to support the area served (the "Detroit effect"). These costs are stretching a diminished City budget to the breaking point. The cleanup costs associated with just the Button Motors, NISCO, and Former Lumber Yard/Cabot priority brownfields are estimated to be at least \$1,500,000 (see Section 4.a for cleanup).

**2. RLF Program Description and Feasibility of Success:** The City has developed a well-functioning brownfields redevelopment program based on its 2012 EPA Hazardous Substances Assessment Grant (Section 5.c). This program's overarching goals are to assess, remediate, and redevelop the brownfields that dominate the City in order to improve the health and welfare of the community, especially those impoverished and minority populations in the targeted communities that disproportionately live near brownfields, and limit contaminant runoff to Wildcat Creek. These goals coincide with those identified by Kokomo's citizens and leaders in



the City's Comprehensive Plan: 1) protect and improve the health and welfare in the City; 2) preserve and enhance the quality of life for residents; 3) maintain Kokomo as a leading community for affordable housing; 4) manage and direct growth to infill and/or redevelop vacant or underutilized properties; 5) provide affordable, usable, quality public facilities for residents; and 6) protect and enhance environmental resources. These objectives coincide with the Livability Principles<sup>1</sup>, which include: promoting equitable, affordable housing; enhancing economic competitiveness; supporting existing communities; and valuing communities and neighborhoods. Using its assessment grant, the City has supported the assessment and cleanup planning of multiple commercial sites in the City. The City now needs RLF grant funds to support cleanup (chemical contamination and/or asbestos abatement) of the priority sites.

**a(i) Program Description:** The City's Department of Development, which has experience managing EPA Brownfields Grants and federally-funded, revolving loan funds, will act as lead organization on the RLF grant project. The RLF Project Team will consist of a Project Manager, Financial Manager, Loan Committee, Board of Public Works and Safety (City contracting agency), Qualified Environmental Professional (QEP), financial advisor, and legal counsel (team details in Section 5.a). The Project Manager will be responsible for RLF program coordination and initial project review, and the Financial Manager will be responsible for project accounting. The Loan Committee will be responsible for the formal project/economic viability review, selecting projects and borrowers, and recommending loans to the Board of Public Works and Safety for approval. The Loan Committee will be supported by a QEP who will review environmental activities, eligibilities, and costs, and a financial advisor will review borrower's company and project financial records and *pro formas*. The team will be supported by the City's legal counsel who will assist in preparation/negotiation of loan and legal documents.

When a potential project is identified and the associated site is determined eligible for RLF funding, the Project Manager will provide the interested party with an information form that he will use to perform an initial project evaluation. If he believes the project supports the City's and RLF Grant's goals and is viable, he will forward the project to the RLF Loan Committee for a formal evaluation. The RLF Loan Committee will review the submissions with support from the QEP and financial advisor, and will evaluate adherence to the City's Comprehensive Plan, zoning, etc.; job creation/retention; reuse of existing infrastructure/incorporation of sustainability components; and greenspace creation or preservation. If the project supports the brownfields' program and Comprehensive Plan's goals and is financially viable, the loan committee will approve the project and forward it to the Board of Works for final approval. After project approval, the Project Manager and Loan Committee, supported by the Financial Manager, QEP and legal counsel, will prepare and negotiate the loan agreement, security agreement, development agreement, promissory note, and mortgage (if applicable). The QEP will prepare the grant documents (Quality Assurance Project Plan, Analysis of Brownfield Cleanup Alternatives, Community Involvement Plan, and Decision Memorandum), help establish a document repository, and coordinate a 30-day ABCA public comment period. After closing the loan, the Project Manager and QEP will review and monitor the following: 1) preparation of bid plans and specifications (to ensure task eligibility, facilitate pay request reviews and approvals, and requirements for compliance with Davis-Bacon and federal cross-cutters); 2) Davis Bacon compliance during response actions; and 3) compliance with work plans and loan/contract documents. They also will review pay requests and perform program reporting.

The key to a successfully revolving RLF program will be selecting the right projects and loan recipients and applying appropriate safeguards to ensure that RLF loans will be repaid in the shortest period possible. Projects will be selected first on eligibility of the borrower and site for RLF Grant funding, and then project quality and compatibility with the Comprehensive Plan's goals. Borrowers will provide three years reviewed or audited financial statements and demonstrate that the project is economically viable through market studies or other empirical evidence. The borrower will provide project *pro formas* that demonstrate return on investment and cash flow sufficient to support the project and loan repayments. Borrowers also must provide

<sup>1</sup> Principles adopted by the partnership between the EPA, U.S. Department of Transportation, and U.S. Department of Housing and Urban Development to promote smart growth.





evidence of sufficient capital (equity plus borrowing) to finance the project. Loans will be made only to borrowers who can demonstrate the following: 1) financial stability; 2) project economic viability; 3) sufficient cash flow or incremental taxes to repay the loan; and 4) eligibility of the project site/response activities for RLF funding. In order to incorporate reasonable and prudent lending practices, no RLF loan will be made until a Development Agreement, spelling out the borrower's and Grantee's obligations/commitments, is negotiated. Furthermore, borrowers must agree to loan terms and security agreements that safeguard loan repayment. Loan repayment periods will be the shortest possible without placing project economics in jeopardy. Loan guarantees and/or security in the form of bonds, letters of credit, or mortgages will be required to collateralize a developer's failure to repay the loan. RLF loans are expected to range from \$100,000 to the available RLF funds because the level of effort and cost to process a loan makes smaller loans inefficient. Interest will be based on the level of risk associated with the loan, project economics, borrower credit worthiness, repayment schedule, likelihood of cleanup success, and priority of the project, and will range from 0% to 5%. Typical loan terms will be 3 to 15 years, with provision for a 1 to 3 year payment deferral to allow project completion and generation of positive cash flow or tax increment revenues to repay the loan. To maximize the RLF, subgrants are not anticipated.

The City knows RLF funds will be insufficient to cover all brownfields redevelopment costs. The City will use the additional fund sources discussed in Section 2.c to fill redevelopment funding gaps and support the following types of activities: site assessment, planning, and site preparation associated with using a brownfield instead of a greenfield; site and building rehabilitation/construction; and additional cleanup discovered during the RLF-funded cleanup. Through careful selection of projects, the City will ensure that the RLF loans are revolved back into the program for continued use to support brownfields redevelopment and ensure the program is sustained after the cooperative agreement is closed. The City will also pursue supplemental RLF funding to continue the RLF program after the initial grant period ends.

**(ii) Marketing Strategy:** Developers of sustainable projects that reduce environmental impacts and create high-wage jobs or affordable housing with greenspace/recreational amenities will be the RLF applicants of choice. The City will seek projects and developers for the priority sites in the target communities/areas described in Section 1. As the economic development arm of the City, the Development Department has gauged interest in redevelopment of City brownfields. Multiple high tech start-ups have expressed interest in an expanded Inventrek Park on the former Delphi brownfield and the City is working with a developer on the YMCA redevelopment of the Button Motors site. In order for these projects to move forward, cleanup funds are needed. The City has made the area's lenders, attorneys, realtors, developers, and businesses familiar with its brownfields program through previous Assessment Grant outreach and marketing efforts. The City will continue to reach out to these entities to educate them on the availability, use, and benefits of the RLF Grant program. The City will also work closely with the Greater Kokomo Economic Development Alliance (GKEDA) to market the grant. GKEDA works to encourage new/existing businesses in the County and provide access to real estate to support economic growth. The GKEDA markets properties and has been involved in the retention of over 1,200 jobs and new capital investment of over \$3.75 million in the County. The City and GKEDA will explain the RLF Grant program when they present to local trade organizations, business groups, and state economic development functions and will develop an RLF Grant fact sheet for distribution. The RLF Grant program and priority sites will be promoted on the City's and GKEDA's websites, which already include details on redevelopable sites.

#### **b. Task Description and Budget Table:**

**(i.) Task Descriptions:** The following four tasks will be required to implement the RLF Program. Approximately 92% (\$918,000) of the RLF budget will go directly to cleanup work. No expenses will be incurred for fringe benefits, travel, equipment, or supplies. Costs for these categories will be in-kind (in-kind costs are summarized below in Section 2.c). The 20% cost share will be achieved by requiring borrowers to contribute, directly or through external leveraging, at least 20% of the costs of conducting response actions (eligible activities associated with Task 3) funded with each RLF loan.





**Task 1 – Programmatic Activities (\$12,000)** City personnel costs of \$7,000 (\$35/hour for 200 hours) and contractual costs of \$5,000 for an environmental consultant for the following activities: RLF program marketing; development of forms/procedures for project submittals; establishing procedures and criteria for reviewing and qualifying projects and borrowers for loans; developing template development agreement, loan, security, and mortgage documents; and managing the environmental consultant and financial advisor. In addition, once a site has been determined to be eligible, it will be entered into the Assessment, Cleanup, and Redevelopment Exchange System (ACRES). ACRES profiles will be updated following completion of cleanup activities. Outputs include completion of project marketing, development of project procedures and forms, development of templates for the four key loan documents, and movement of up to ten potential RLF loan projects to the loan committee for evaluation.

**Task 2 – Project Review, Cleanup Planning, and Community Involvement (\$32,000)** City personnel costs of \$7,000 (\$35/hour for 200 hours) and contractual costs of \$25,000 for an environmental consultant/financial advisor for the following activities: reviews of project summaries, site characterization reports, requested funding, and project financial *pro formas*; and preparation of Analysis of Brownfields Cleanup Alternatives (ABCAs), Community Relations Plans (CRPs), Decision Memoranda, and loan and security agreements. The City will provide in-kind staff resources valued at \$40,000 (800 hours at \$50/hour) to prepare loan documents, document site selection process, and establish document repositories. Outputs include selection/processing of up to four projects for funding and completion of all document preparation and community involvement activities (at least three per project).

**Task 3 – Environmental Cleanup and Monitoring (\$938,000)** Contractual costs of \$20,000 for an environmental consultant to monitor cleanups for compliance with RLF Grant provisions, Davis-Bacon/federal cross-cutting requirements, and Voluntary Cleanup Program (VCP) cleanup goals/criteria. Contractual costs also include technical reviews of cleanup plans/reports, cost tracking, invoicing, and coordination with the state environmental agency. This task includes \$918,000 to provide loans to up to four eligible entities at a cost of \$229,500 each. The City anticipates providing \$10,000 of staff and equipment time to support site access for cleanup activities, and the City will provide up to \$315,000 from its EDA/USDA RLF Loan funds to support construction and working capital costs on sites cleaned up using the EPA RLF funds. Outputs include completion of up to four loan-funded cleanups, up to four Davis-Bacon compliance reports, and regulatory sign-off on conformance of cleanup projects with the VCP.

**Task 4 – Loan Management (\$18,000)** City personnel costs of \$12,000 (\$50/hour for 240 hours) and contractual costs of \$6,000 for an environmental consultant for the following activities: review/approval of invoice activities and amounts; tracking invoices/costs against approved work plans and budgets; preparing quarterly reports; tracking measures of success; and revolving loan fund operation. Outputs include project accounting, grant drawdown, invoice payment for up to four loans, and on-time quarterly reports.

**(ii) Budget Table:**

<b>Hazardous Substances – Project Tasks for Loans</b>					
<b>Budget Categories</b>	<b>Task 1 Programmatic Activities</b>	<b>Task 2 Project Review, Cleanup Planning, and Community Involvement</b>	<b>Task 3 Environmental Cleanup and Monitoring</b>	<b>Task 4 Loan Management</b>	<b>Total</b>
Personnel	\$7,000	\$7,000		\$12,000	\$26,000
Contractual	\$5,000	\$25,000	\$20,000	\$6,000	\$56,000
Loans			\$918,000		\$918,000
Federal Funding Subtotal	\$12,000	\$32,000	\$938,000	\$18,000	\$1,000,000
Cost Share			\$200,000		\$200,000
<b>Total</b>	<b>\$12,000</b>	<b>\$32,000</b>	<b>\$1,138,000</b>	<b>\$18,000</b>	<b>\$1,200,000</b>



**c. Ability to Leverage:** The following table identifies local resources the AEDC will use to support redevelopment. Additional federal and state sources are listed below the table.

Source	Resources and Role	Estimated Value	Likelihood
City	Staff time to prepare template/actual loan agreements, document site selection process, establish document repositories.	<b>\$40,000</b> (800 hrs @ \$50/hr)	100%
	Staff and heavy equipment to support site access (site clearing, building access, light excavation, etc.).	<b>\$10,000</b> (equip/staff @ \$1,000/day, 10 days)	100%
Technology/ Industry RLF Program	EDA/USDA RLF Loan to support construction, equipment, or working capital for primary sector businesses redeveloping brownfields.	Up to <b>\$300,000</b> per loan	100%
Emerging Business RLF <sup>1</sup>	EDA/USDA RLF Loan to support construction, equipment, or working capital for new/emerging businesses redeveloping brownfields	Up to <b>\$15,000</b> per loan	100%
Kokomo Tax Increment Financing (TIF) district <sup>1</sup>	Property tax revenue generated from redevelopments used for site acquisition, public infrastructure improvements, and site improvements	Depends on value of redevelopment	100% if in TIF district
Tax abatement <sup>1</sup>	Property tax abatement on new equipment and real property improvement for up to 10 years	Depends on value of redevelopment	100% if eligible
Facade Improvement <sup>1</sup>	Loan for facade enhancement in downtown area	≤ <b>\$5,000</b> per loan	100% if in district
Green Practice <sup>1</sup>	Loan for installation of green and energy efficient products	≤ <b>\$5,000</b> per loan	100% if eligible
Neighborhood Blight Removal <sup>1</sup>	Grants and loans for demolition (demo) of unsafe structures and renovation (reno) of residential structures	≤ <b>\$5,000</b> per demo loan; ≤ <b>\$23,000</b> per reno loan	100% if eligible

<sup>1</sup> Commitment letters attached in Attachment D.

The following state and federal resources are available by application and may be used to supplement grant funds:

- Excess Liability Trust Fund (ELTF) – reimbursement of monies spent to clean up petroleum releases from underground storage tanks.
- Community Development Block Grant (CDBG) - Department of Housing and Urban Development funds for construction of low to moderate income residents.
- State of Indiana Economic Development for a Growing Economy, Headquarters Relocation Tax Credit, Hoosier Business Investment Tax Credit, and Industrial Recovery Tax Credit - tax credits and abatements for redevelopments.
- U.S. EPA Brownfields RLF Grant Supplemental Funding and/or Cleanup Grants-The City can apply for annual supplemental RLF funding, and/or Cleanup Grants of up to \$200,000 per site for grantee-owned property.

### 3. Community Engagement and Partnerships

**a. Plan for Involving Targeted Community and Other Stakeholders:** The main stakeholders in any RLF project will be residents/property owners, community/citizens groups, business organizations in the area of the project, and the lenders and developers conducting or supporting the actual cleanup work. The methods for reaching each of these groups will vary. The Kokomo Urban Outreach (KUO) (Section 3.c) and Minority Health Alliance of Howard County (Health Alliance) will be vital to involving residents/property owners and community/citizens groups in the planning and implementation of the RLF program. The KUO is a group of churches and volunteers that provide services to impoverished individuals and families in Kokomo and acts as



a liaison between minority populations, City organizations, and local health organizations. The Health Alliance is a non-profit group developed to promote wellness, improve access to health care, and improve disadvantaged residents' health. These two organizations will provide links between the City and the disproportionately impacted minority populations living in the target communities, allowing for information sharing and giving residents/citizens groups a way to voice their health and safety concerns for RLF funded cleanups. The City will provide information regarding the RLF grant (i.e., project planning, potential site selection, cleanup decisions, and reuse planning) to the KUO, which will disseminate it to their predominately minority congregations, and to the Health Alliance, which will ensure that the information is readily available to the community by using their existing door-to-door, community outreach/education program (currently used to provide health education and information of available health care resources). In order to reach other stakeholders (businesses, lenders, and developers), the City will provide written and electronic notices to local businesses who will be impacted by RLF activities, and the lenders and developers involved in the project. As discussed below, the information will include details on the times/locations of public meetings and location of internet forums that the City will use to collect stakeholder comments and concerns on cleanup and redevelopment activities.

The City is committed to seeking out citizens and giving them the opportunity to express their concerns regarding health, safety, and community disruption associated with cleanup activities. Because the KUO and Health Alliance are actively working with residents throughout the City and going door-to-door in the targeted communities/areas, they will be able to identify sensitive populations that will be impacted by specific cleanup projects. Once sensitive populations are identified, the City can work with the Howard County Health Department and the Indiana Department of Environmental Management (Section 3.b) to ensure that cleanup activities and redevelopment plans are protective of these populations.

Once awarded the RLF grant, the City will announce the award to the community and solicit input to the Work Plan/Project Budget through a press release to local newspapers and online news forum and by posting a notice on the City and GKEDA's websites. The City will place advertisements on the local area radio stations to reach the less literate members of the community and those without internet service, and also send written or electronic notices to local businesses (bankers, real estate brokers, and developers). In addition, the City will have the KUO and the Health Alliance distribute fliers to impoverished residents in the targeted communities who may not have access to television or internet services. The City will establish a Facebook page and LinkedIn group for the grant, allowing the community to interact with the City in real time during the project. The City will include instructions on how to reach these internet forums in the press release. News releases, web postings, and written materials will include Spanish-language notices that versions of all community outreach materials are available and that translators will be available for public meetings. This will allow Hispanic, non-English speaking residents in the City (3.3%, *2008-2012 American Community Survey*) and the targeted areas to participate in the public process.

Hard copies of the draft Work Plan and project documents will be available at City Hall and the Kokomo Library to ensure access for those without computer availability, knowledge, or experience. The public will be able to provide comments verbally to the Project Manager, electronically on Facebook and LinkedIn, and in writing via e-mail or letters. The comments will be discussed during an initial public kick-off meeting, which will be held at City Hall, to acquaint residents/property owners, citizens groups, businesses, lenders, and developers (stakeholders) with project goals and operational principles. The draft Work Plan will be modified in response to relevant comments. The next community outreach/involvement effort will occur when each of the following project activities occur: a site/project has been proposed for an RLF loan, a site has been selected for an RLF loan, remediation approach has been proposed, or a draft Alternatives of Brownfield Cleanup Alternatives (ABCA) has been prepared. Document repositories will be established at the City Hall and Kokomo Library and documents will be posted on the City's website, Facebook, and LinkedIn. Notices of 30-day period for public comment on the ABCA, selected alternative, and proposed redevelopment plan will be disseminated as previously discussed. Public meetings will be held at readily identifiable and



accessible public buildings in, or as close as possible to, the target neighborhood at the end of the comment period to receive and discuss additional comments. These meetings will be held in the evenings to maximize citizen attendance. Meetings will be taped and placed on the City's website so that stakeholders can watch the videos in the event that they cannot attend the meetings. The City will partner with the KUO and Health Alliance to identify meeting locations and methods to involve as many residents in the targeted areas as possible. Additional public meetings will be held at the conclusion of each site cleanup to summarize results of cleanup, discuss redevelopment plans for the site, and provide information on times/locations of future site planning meetings (planning and zoning meetings, etc.) associated with the planned redevelopment activities. This information will also be posted on the City's website for stakeholders to review on their own. All comments will be documented, and appropriate modifications will be made to the cleanup and/or redevelopment plans.

**b. Partnerships with Government Agencies:**

**(i) Environmental and Health Agencies:** The City will develop a partnership with local and state environmental/health agencies to ensure the project's success. The Howard County Health Department (HCHD) is actively involved in education/notification, testing, and monitoring related to septic system concerns, clandestine methamphetamine laboratories, lead poisoning, and groundwater protection. The HCHD provides blood lead testing to children and can provide groundwater testing, if needed. The expertise of HCHD will be used to help identify/verify off-site health threats posed by identified contamination; identify toxicological issues and perform risk evaluations; conduct notification/education programs; and coordinate health testing if brownfields contaminant migration is confirmed.

The City will maintain the partnership, established with Indiana Department of Environmental Management (IDEM) through the existing brownfields program, to help ensure appropriate RLF cleanup and safe brownfields redevelopment. RLF cleanups will be conducted in compliance with IDEM's Voluntary Remediation Program (VRP) (Indiana VCP), which operates as the local environmental oversight structure. IDEM will review and approve Remediation Work Plans and Remediation Completion Reports for sites where response actions are completed. Partnering with IDEM VRP and/or Indiana Brownfields Program (IBP) district and headquarters staff will be important for acquisition of technical support, resolution of regulatory or procedural issues, and interpretation of rules and guidance documents. IDEM's cleanup criteria established under the Remediation Closure Guide will be used to identify and address on-site health and environmental threats posed by the identified contaminants. If contamination discovered during cleanup has the potential to negatively impact the health of local populations, especially as related to off-site exposures, IDEM and the HCHD will be brought in as project partners.

**(ii) Other Agencies:** The City will continue their partnership with the EPA, developed during their Assessment Grant, to secure site eligibility determinations and work through RLF program approvals. The City will develop a partnership with the EPA's Regional Sustainable Environmental Sciences (RESES) program to develop an approach and tools to help the City include ecosystem goods and services (e.g., availability of potable water and clean air, maintenance of biodiversity, groundwater recharge, flood regulation, climate regulation, aesthetic and recreational opportunities) in their brownfields redevelopment planning and decision making and develop community-wide sustainability goals. The City will consult with the Indiana Finance Authority Brownfields Sustainability Initiative for guidance and insight into successful sustainable redevelopment of brownfields. The City will also partner with the Indiana Housing and Community Development Authority to secure technical and financial assistance to create and preserve safe low-moderate income housing in the targeted communities/areas, and the Indiana Economic Development Corporation (IEDC) to assist with site marketing and provide expertise in repurposing of brownfields to assist with job creation and job retention.

**c. Partnerships with Community Organizations:** The following community-based organizations will be directly involved in the RLF Grant project; letters of support are in Attachment E. The City already works with these organizations to enhance the quality of life for residents and will continue those partnerships throughout the RLF grant project.



***Wildcat Guardians:*** The Wildcat Guardians is a County-wide citizen group seeking to improve, preserve, and protect Wildcat Creek. The Wildcat Guardians will assist in identifying brownfields along Wildcat Creek and assist the City in integrating ecological enhancements as part of the remediation and redevelopment of these brownfields.

***Kokomo Urban Outreach (KUO):*** KUO is a network of churches, individuals, and organizations seeking to improve Kokomo neighborhoods by providing education for women and children, youth programs and faith-based programs, and developing neighborhood councils. KUO will disseminate information on the availability of RLF grant, sites selected for cleanup, potential health concerns associated with selected sites, and results of the cleanup activities. KUO will work with the City to ensure that impoverished and minority residents' concerns regarding health, safety, and community disruption associated with cleanup activities are solicited and addressed during the cleanup and redevelopment process. KUO will also work to keep the residents and businesses informed on the progress of redevelopment efforts in the neighborhood.

***Purdue University Kokomo (Purdue):*** Purdue will encourage students and staff to volunteer to participate in on-the-ground community involvement activities (distributing information on sites selected for cleanup, cleanup activities, and redevelopment plans). They will also work to keep students updated on the active RLF cleanup projects so students can pursue employment opportunities in the environmental remediation field.

***Greater Kokomo Chamber Council (Chamber):*** The Chamber works to represent and promote Howard County businesses and encourage business/industrial investment in the community. The Chamber will assist in identifying brownfields needing cleanup, support redevelopment planning following cleanup, help market remediated brownfields, and inform business and potential developers of the availability of grant funds.

***Greater Kokomo Economic Development Alliance (GKEDA):*** The GKEDA was formed to coordinate economic development resources available to support development within the County. The GKEDA will use its redevelopment experience to provide brownfields redevelopment planning, guidance, and marketing support throughout the County (Section 2.c.i).

#### **4. Program Benefits**

**a. Health and/or Welfare and Environment:** The cleanup and subsequent redevelopment of brownfields will result, either through remediation or engineering controls, in a reduction in citizens' exposures to contaminants and limit contaminant migration into Wildcat Creek. Brownfields pose these threats by allowing uncontrolled access to contaminated sites and buildings containing hazardous materials, all of which the public is often unaware are dangerous. By redeveloping these brownfields with accessible public amenities, urban greenspace and gardens, and affordable entertainment and housing options, the City hopes to create a more equitable community that provides residents access to affordable housing, healthier food, and entertainment options. This will in turn create a safe community that residents can enjoy. Redevelopment of these brownfields epitomizes the equitable development principles of utilizing new investment in economically disadvantaged neighborhoods in a way that directly benefits the residents. Furthermore, because this work will be completed on existing industrial and commercial sites, residents will not be displaced from their homes or neighborhoods during cleanup and redevelopment. The cleanup of brownfields along Wildcat Creek, including on-site stormwater management, will also limit uncontrolled, nonpoint pollution sources and illicit discharges into the Wildcat Creek watershed. This will reduce contaminants in the Creek, improve aquatic life, and allow for fishing and recreational activities so the creek can become a safe, accessible, focal point of the community, a major part of Kokomo's vision for the future. These benefits coincide with the City Comprehensive Plan's goals of protecting/improving the health and welfare, enhancing the quality of life for residents, and protecting environmental resources while directing growth to infill existing areas/neighborhoods. The specific health and welfare risks described in Section 1 will be abated when exposures to contaminants and other dangers on priority sites are mitigated (see table). Similar benefits, in whole or part, can be expected from redevelopment of other brownfields. These redevelopment outcomes coincide with the guiding Livability Principles of increasing economic competitiveness (*redevelopment of Technology Park brownfields with an expanded business incubator*), leveraging federal



investment (*RLF grant dollars*), and valuing/supporting the community and its neighborhoods (*directing funds and redevelopment into the targeted communities/areas*).

Targeted Area	Redevelopment Outcomes
<b>DOWNTOWN DISTRICT</b>	<b>Button Motors</b> - The site will be secured and remaining building foundations will be demolished/recycled. Soil contamination will be removed or capped, and VOC-impacted soil and groundwater will be remediated to limit vapor intrusion/inhalation health concerns for minority residents and students and contaminant migration to nearby Wildcat Creek. The site will be redeveloped into a state of the art YMCA/public arts center. <b>Apperson Way</b> - Hazardous building materials (i.e., asbestos and lead-based paint) will be abated and buildings will be demolished. Soil contamination will be removed or capped, and solvent- impacted soil and groundwater will be remediated to limit vapor intrusion/inhalation concerns for residents and nearby students. The site will be redeveloped with low-income housing with an urban vegetable garden/greenspace.
<b>CENTRAL KOKOMO</b>	The sites will be secured, asbestos and lead-based paint will be abated, and remaining buildings and foundations will be demolished/recycled. Soil contamination will be removed/capped, and metals/organics impacted soil and groundwater will be remediated to limit vapor intrusion/inhalation health concerns for low-income residents. Barrier systems will be installed to protect Wildcat Creek from contaminated groundwater. The <b>Nisco</b> site will be redeveloped with a Convention Center with first floor commercial/retail to support area events and add shopping/dining options. The <b>Former Lumber Yard/Cabot</b> site will be redeveloped urban greenspace and a community vegetable garden that will connect to the Walk of Excellence trail and provide canoe/kayak access to Wildcat Creek. Contaminated stormwater will be eliminated, protecting the creek.
<b>TECHNOLOGY PARK</b>	Groundwater remediation will be completed, and vapor extraction or barrier systems will be installed to allow safe construction and use of new Iventrek Technology Park business incubator buildings. A portion of the site will be used to construct a solar field to provide electricity to the technology park.

RLF Grant operating procedures will ensure that the residents are protected from contaminants during cleanup. The public will be notified that the cleanup is happening. A Health and Safety Plan will be completed for each site, and access to the site will be controlled with fencing and signage during cleanup operations. Dust suppression measures will be taken to control exposures to airborne dusts, and when contaminated soil/groundwater or hazardous building materials are disturbed, the release of particulates and vapors will be monitored and controlled. Procedures will be implemented to minimize/control track-out of contaminated soil during cleanup activities. Streets and sidewalks will be cleaned, as needed, to remove tracked out soil.

**b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse:** In order to promote sustainability during cleanup activities, the City will require developers who receive RLF funds to use green remediation techniques (idling reduction plans for diesel equipment, emissions controls for equipment, solar-powered equipment, biofuels, and minimizing noise and light disturbance) for cleanup. This will result in a reduction in air emissions and resource use during cleanup. The City will use its project plan approval process and site plan review process to ensure that brownfields redevelopments incorporate innovative stormwater management techniques (rain gardens, bioswales, etc.), deconstruction and source separation rather than traditional demolition of buildings, and use of low-volatility building materials (paints, adhesives, etc.) into brownfields redevelopments. This will result in reduced treatment of stormwater, reduced waste generation, and healthier homes/buildings. The City will require RLF Grant funded projects to include greenspace elements in site plans, which supports City ordinances that suggest that buffer strips and riparian zones be preserved to assist in controlling stormwater runoff. To foster sustainable redevelopment, RLF Grant funds will only be provided for projects where necessary infrastructure exists or can be upgraded at a reasonable cost. This





will allow the City to direct redevelopment into areas with existing infrastructure, limiting expenditures on utility extensions, reducing the use of construction materials (steel and concrete pipe, fiber optic lines, etc.), and reducing air emissions (greenhouse gases, particulate matter) from construction. These sustainable development approaches will help the City reuse existing resources, reduce fossil fuel use and emissions, and minimize its energy use and waste generation during brownfields redevelopment. Furthermore, because most brownfields in the City are abandoned/underutilized manufacturing/commercial buildings located in areas served by existing infrastructure, the reuse of these sites epitomizes sustainable redevelopment. The City has shown its commitment to sustainable development with its “K-Fuel” program, which uses biofuel converted from waste cooking oil to fuel its municipal trucks and construction of an energy efficient Inventrek business incubator building (\$800,000 in energy savings).

For the Downtown District, Technology Park, and Nisco (Central Kokomo) priority brownfields, which will be redeveloped, respectively, with a YMCA/art center, convention center, and business incubator, the City will require the installation of energy efficient heating/cooling and lighting systems, resulting in a reduction in electricity and natural gas usage and reduced operating costs for owners/occupants. For the YMCA and convention center buildings, the City will require that the buildings be certified through the Leadership in Energy and Environmental Design (LEED) program. By constructing a solar field at the Technology Park priority site, the City can reduce its electricity consumption and set an example for the community.

**(ii) Example of Efforts:** The City and the Greater Kokomo Development Alliance (GKEDA) constructed the first portion of the Inventrek Tech Park, a high-tech business incubator, on a former Delphi manufacturing site that had been abandoned. This redevelopment resulted in the cleanup of a contaminated site centrally located in an impoverished minority neighborhood, thereby improving residents’ health and welfare and increasing property values in the neighborhood, which coincide with the livability principle of valuing neighborhoods and communities. The incubator has supported the development/advancement of 15 local, high-tech companies, which supports the equitable development principals of creating community-owned, cooperative business that are supportive of local entrepreneurial activities.

**c. Economic Benefits:** Redevelopment of brownfields will create jobs, improve the tax base, and provide new affordable housing, all of which will help meet the City’s Comprehensive Plan’s goals of preserving/enhancing residents’ quality of life, maintaining Kokomo as a leading community for affordable housing, directing growth to infill and/or redevelop vacant or underutilized properties, and providing public facilities for residents.

**(i) Economic Benefits:** One of the most important benefits of brownfields redevelopment will be reinvestment in the City’s Downtown District and residential neighborhoods in the Central Kokomo area. The redevelopment of commercial sites in the Downtown District will create additional affordable housing with easy access to commercial/retail and entertainment amenities. This will also reduce the disproportionate impact on home values in the minority-populated targeted communities, help encourage improved homeowner equity in the area, and increase the tax base. Increased housing, retail, recreational, educational, and employment options are expected to improve living conditions in the struggling downtown and central Kokomo neighborhoods and attract additional service and retail development, further revitalizing the downtown and improving the tax base. The Convention Center and new arts center will attract visitors/users from outside the City and bring additional income for area businesses. The further redevelopment of brownfields in the Technology Park will stimulate the local economy by supporting innovative industries and providing job opportunities for a desperate work force. More importantly, the City will have a more heterogeneous economic base, rendering it less vulnerable to disproportionate impact from a single market sector. These outcomes coincide with the Livability Principles of valuing and supporting the community and its neighborhoods and increasing economic competitiveness. In addition to improving the tax bases, the redevelopment of three of the priority sites will have the following direct economic benefits:

- **Button Motors:** Construction of a new YMCA and arts center will result in private investment of over \$8 million (~\$160,000 annual tax revenue) and provide residents with increased recreational opportunities and cultural enhancement.





- **NISCO:** Construction of a convention center will result in private investment of over \$15 million (~\$300,000 in annual tax revenue) and provide Kokomo with a site to host conferences, conventions, and other social events. The convention center will employ up to 100 people and bring in \$250,000 in rental fees annually.
- **Delphi:** New incubator building construction will create 10 to 15 construction jobs and an investment of over \$1.5 million (~\$30,000 annual tax revenue). Five to ten new, high-tech businesses will be placed in the new business incubator building. Once established, these businesses will move into a portion of the over 1.5 million square-feet of manufacturing/office space available in underused GM/Delphi buildings. The process will then repeat, providing a stream of start-up business that would use available industrial space.

The redevelopment of priority brownfields will also result in creation of parks and greenspace within the City. By redeveloping brownfields with parks and greenspace, the City will provide residents with easily accessible and affordable recreational options that support the Comprehensive Plans' objectives of establishing parks with passive recreation and accessible natural areas. The City intends to extend Kokomo's Walk of Excellence pedestrian and bike trail and hopes to develop an area canoeing program. The redevelopment of the Former Lumber Yard/Cabot priority site with a canoe/kayak access dock and urban greenspace will increase access to the creek and extend the existing Walk of Excellence trail. As additional trails are added in the City, residents will be able to reach more areas in the City without using a car, supporting the Livability principle of providing more transportation options.

***(ii) Local Hiring/Procurement:***

There are no U.S. EPA Environmental Workforce Development and Job Training programs currently operating in the City or Howard County. Kokomo has an Economic Development Income Tax (EDIT) Job Training Grant that it uses to assist local businesses in training new workers and retraining existing workers. The City will use the EDIT program and the Indiana Region 4 Workforce Board (WorkOne) to connect with the available workforce and promote local hiring for brownfields remediation and redevelopment. The City will use its connection with Purdue University Kokomo (Section 3.c) to link residents to education and training to learn skills needed for employment in the environmental field. Once trained, residents can be hired by local remediation contractors completing the cleanup activities on RLF funded sites. The City will update the WorkOne and Purdue program directors on the active RLF projects so they can provide their students with potential employment opportunities.

**5. Programmatic Capability and Past Performance**

**a. Programmatic Capability:** The City has established a successful brownfields program using its Assessment Grant. The City's Department of Development, which manages the Assessment Grant, has managed a U.S. Department of Commerce, Economic Development Administration (EDA) and U.S. Department of Agriculture (USDA) RLF grant program since 1982. Since then, they have provided 30 loans to local businesses (totaling approximately \$3.2 million) and over \$2 million in grant funds have been successfully revolved. The City is ready to expand the brownfields program and has assembled an experienced team capable of managing the RLF Grant. The RLF Project Team will consist of a Project Manager, Financial Manager, Loan Committee, Board of Public Works and Safety (City contracting agency), Qualified Environmental Professional (QEP), financial advisor, and legal counsel.

The RLF Grant Project Team will be led by Mr. Paul Allor (Project Director), who has 10 years of redevelopment, brownfield, and loan management experience in Kokomo. Mr. Allor will be responsible for all grant operations (community outreach, marketing, initial project evaluations, site/loan document preparation, reporting, etc.), payment requests and transfers through the Automated Standard Application for Payments (ASAP) system, and management of the environmental consultant and financial advisor. Mr. Stephen Whikehart, Development Director, has been involved in the daily grant operations for the current Assessment Grant and will serve as the Assistant Project Director. Ms. Thu Caven, Deputy City Controller with over 10 years experience in municipal accounting, will serve as the Financial Manager and will be responsible for establishing and managing the program's financial accounts. The Loan Committee is a 12-



person committee made up of representatives from local banks, accounting firms, and appraisers, one local government representative, and one member of the GKEDA. The Loan Committee will be responsible for the formal project/economic viability review, selecting projects and borrowers, and making loans. Proven Loan Committee procedures are in place for reviewing loan requests, creating loan documents, tracking repayments, and enforcing loan and development agreements. The City will retain an environmental consultant (QEP) to assist in managing and tracking the activities funded by the RLF grant, and a financial advisor to assist with evaluation of potential borrower's company and project financial records and *pro formas*. The firms will be retained using a Qualifications-Based Selection Process that complies with the applicable federal procurement regulations (40 CFR §31.36). Mr. Eugene McGarvey of Button, McGarvy, Trauring, Wilson and Oaks, who has worked with the City on the EDA/USDA RLF program since it started in 1982, will provide legal advice.

The City will endeavor to maintain the grant management team in place during the entire grant project. Mr. Whitehart will become intimately familiar with the new grant operations so he can immediately step in as either interim or replacement Project Manager in case of loss or re-assignment of Mr. Allor. Mr. Whitehart and the environmental consultant will have the responsibility for continued operations, selection, and training of a new Project Manager, and training of any new team members, if needed.

**b. Audit Findings:** The City has not received any adverse audit findings from an OMB Circular A-133 audit or an audit conducted by a federal or state government inspector.

**c. Past Performance and Accomplishments:**

**(i) Currently has an EPA Brownfields Grant:** The City, as part of a Coalition with Howard County and the Cities of Greentown and Russiaville, was awarded an EPA Assessment Grant for hazardous substances and petroleum products in 2012 (\$400,000(hazardous), \$200,000 (petroleum); BF00E01157-0). Mr. Allor is responsible for management of the grant.

1. Compliance with Grant Requirements: The City developed a Work Plan and successfully negotiated a Cooperative Agreement (CA) with the EPA in 2012. The City complied with the Work Plan and its associated schedule, terms, and conditions. The City submitted and received approval of a Quality Assurance Project Plan (QAPP), complied with quarterly reporting and annual financial status reporting requirements, and submitted to the EPA, via the ACRES database, the site information and assessment data for each site assessed thus far with grant funds. The City supported the assessment of 13 sites (12 in the City and one in Russiaville), resulting in the preparation of comfort letters (see below) for 2 sites and cleanup/redevelopment planning for 9 acres of brownfields, including the Apperson Way, NISCO, and Former Lumber Yard/Cabot priority sites. The Assessment Grant is being used successfully to support the initial stages of brownfields redevelopment. Approximately \$458,599 (\$301,449-hazardous; \$157,150-petroleum) of the FY2012 grant funds remain and will be expended by the end of the grant period in 2015. The Assessment Grant funds are allocated to assessments of additional downtown district parcels and assessments of additional sites throughout the County. Because Assessment Grant funds cannot be used for cleanup, the City is pursuing RLF funds to support brownfields remediation activities at the sites in the targeted areas.

2. Accomplishments: At this time, the following outputs have been achieved: 12 Phase I ESAs and 12 Phase II ESAs have been/are being completed, and 2 requests for comfort letters (letter issued to a party that qualifies for an applicable exemption to liability found in Indiana law or IDEM policy, but is not a legal release from liability) have been prepared for the Indiana VCP. Using these grants, the City has supported the following outcomes: assessment of 16.5 acres of brownfields, cleanup/redevelopment planning for 9 acres of brownfields, and the start of a redevelopment of a former parking garage into a mixed-use residential/commercial development. These outputs and outcomes have been reported in ACRES. The City feels that the grant is supporting the initial stages of redevelopment of commercial/industrial areas of the County; however, there are many remaining large brownfields within the City that need to be cleaned up and redeveloped in order for Kokomo to fully recover from the 2008/2009 automotive industry bankruptcies and subsequent national recession and become a more livable City.



**ATTACHMENT A**  
**THRESHOLD DOCUMENTATION**



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**THRESHOLD CRITERIA**  
**FY2014 HAZARDOUS SUBSTANCES REVOLVING LOAN FUND GRANT**  
**CITY OF KOKOMO, INDIANA**

1. **Applicant Eligibility:** The City of Kokomo is a General Purpose Unit of Local Government in the State of Indiana.
2. **Description of Jurisdiction:** The RLF Grant will serve the entire City of Kokomo, an area encompassing approximately 18 square miles, as defined by the City boundaries.
3. **Letter from State Environmental Authority:** The City has received a letter (Attachment B) from the Indiana Department of Environmental Management (IDEM) acknowledging that the City plans to establish a revolving loan fund and conduct cleanup activities using federal grant funds.
4. **Oversight Structure and Legal Authority to Manage a Revolving Loan Fund Grant**
  - a. The City will oversee cleanups by 1) requiring IDEM Voluntary Remediation Program (VRP) and/or Indiana Brownfields Program (IBP) approval of cleanup plans to ensure compliance with the Indiana response action program and 2) retaining a qualified environmental consultant to monitor the borrower's activities to ensure conformance with approved cleanup plans and applicable laws and regulations.

The City will require each loan recipient to obtain IDEM approval of Response Activity Plans before conducting cleanups. The City will include that requirement in redevelopment and loan documents. Cleanups in Indiana are governed by Indiana Code (IC) 13-12-3-2 and IC 13-25-5-8.5, which ensure that response actions that are protective of human health and safety; include public involvement components; and provide appropriate oversight and technical assistance. To support consistent application of the relevant Indiana Codes, IDEM has developed the Remediation Closure Guide (RCG), which describes selected approaches to investigation and risk-based closure of contaminated sites. Non-liable developers can participate in either the IBP or IDEM VRP programs. The first step for both programs is submittal of a Remediation Work Plan with a Record of Remedy Selection form for verification that the planned response actions comply with the Indiana Code and RCG guidelines. If the Remediation Work Plan is submitted to and approved by the IBP, the developer will complete the approved response actions and subsequently submit a Remediation Completion Report to the IBP. The IBP will review the Remediation Closure Report and provide the developer with a Brownfields Comfort Letter or Brownfields Site Status Letter. A Brownfields Comfort Letter is not a release from liability, but explains a specific liability exemption, established by statute or IDEM policy and applies the exemption to the site and letter recipient(s). In this way, a Brownfields Comfort Letter may eliminate unnecessary liability concerns for a site with no liability for current or future users. In a Brownfields Site Status Letter, site conditions are compared to objective, risk-based cleanup standards. While a Brownfields Site Status Letter is also not a release from liability, it may serve to minimize and qualify the exposure to risk for remaining liability at a site.

If the Remediation Work Plan is submitted and approved by the IDEM VRP, the developer will complete the approved response actions and subsequently submit a Remediation Completion Report and Record of Site Closure form to the IDEM VRP. The IDEM VRP

**ATTACHMENT B**  
**LETTER FROM STATE AUTHORITY**



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## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Michael R. Pence  
Governor

Thomas W. Easterly  
Commissioner

January 22, 2014

Mr. Paul Allor  
Development Specialist  
City of Kokomo  
City Hall, 100 South Union Street  
Kokomo, Indiana 46901

Re: U.S. EPA Brownfields Grant Proposal  
Acknowledgement Letter  
Community-wide RLF  
Hazardous Substances  
City of Kokomo  
Howard County, Indiana

Dear Mr. Allor:

This letter is provided in support of the City of Kokomo's (City) proposal to the U.S. Environmental Protection Agency (U.S. EPA) for Brownfields Community-Wide Revolving Loan Fund (RLF) Grant funding. The Indiana Department of Environmental Management (IDEM) acknowledges that the City is applying for \$1,000,000 for hazardous substances to support cleanup of brownfields to begin the process of revitalizing the portions of the City of Kokomo that have been hit the hardest by the economic decline that has occurred in the past 15 years.

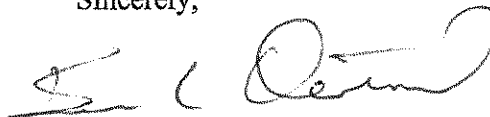
IDEM believes that that City of Kokomo has demonstrated its commitment to redeveloping brownfields by taking advantage of financial and technical assistance offered by U.S. EPA and the Indiana Brownfields Program in the past. This RLF grant funding will help the City continue its effort to address brownfields in the community. IDEM realizes that the City is committed to participating in the Indiana Brownfields Program and/or the IDEM Voluntary Remediation Program for oversight of grant-funded site activities.

Based on the information submitted, IDEM considers the City of Kokomo an excellent candidate to receive U.S. EPA grant funding to continue its brownfield redevelopment efforts, which support Indiana's brownfield initiative. IDEM looks forward to continuing its partnership with the City of Kokomo. For further assistance, please contact Michele Oertel of the Indiana Brownfields Program toll free at (800) 451-6027, ext. 4-0235, or directly at (317) 234-0235 or at [moertel@ifa.in.gov](mailto:moertel@ifa.in.gov).



A State that Works

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Oertel", written over a horizontal line.

Bruce A. Oertel, Chief  
Remediation Services Branch  
Office of Land Quality

BAO/mmo

cc: *(via electronic transmission)*  
Linda Mangrum, U.S. EPA Region 5  
Kelley Moore, U.S. EPA Region 5  
Debbie Sherwood, SME



**ATTACHMENT C**  
**LEGAL OPINION**





CITY of KOKOMO

[www.cityofkokomo.org](http://www.cityofkokomo.org)

**GREG GOODNIGHT, MAYOR**

City Hall - 100 South Union Street

Kokomo, Indiana 46901

[mayor@cityofkokomo.org](mailto:mayor@cityofkokomo.org)

(765) 456-7444

January 21, 2014

Mr. Don West

ENVIRONMENTAL MANAGEMENT SUPPORT, INC.

8601 Georgia Avenue, Suite 500

Silver Spring, Maryland 20910

Re: Application for Environmental Protection Agency Grant

Dear Mr. West:

I am Corporation Counsel for the City of Kokomo, Indiana. The City of Kokomo has the legal powers and authority necessary to receive, hold and administer funds in the operation of a revolving loan fund per C.F.R. § 307.7 *et. seq.*

Kokomo Common Council Resolution #2042 (6/1/82) directed the Kokomo Board of Public Works and Safety to enter into agreement with Kokomo Development Corporation for the operation of an industrial development loan funds. Board of Works entered into such an agreement through Resolution #1982-10 (6/18/82). Subsequently, Economic Development Administration required the City to implement a Revolving Loan Fund Management Plan (3/13/94). This plan required the establishment of an RLF Loan Board. The Kokomo Board of Public Works & Safety will provide final approval and disbursement of loans upon recommendations from the RLF Loan Board.

It is my opinion that the City of Kokomo by or through the Board of Public Works & Safety has the necessary municipal powers and authority to apply for and receive a grant from the U.S. Environmental Protection Agency to establish and operate a revolving loan fund to promote the redevelopment of brownfield sites, including all powers necessary to collect and receive loan payments and to enforce the other terms of a loan agreement.

The City has legal authority to access and secure sites in the event of an emergency to default of a loan agreement or non-performance under a sub-grant, if applicable.

Sincerely,

A handwritten signature in black ink, appearing to read 'L McCormack', written over a horizontal line.

Lawrence McCormack  
Corporation Counsel

*Lawrence McCormack, Corporation Counsel, 100 S. Union, Kokomo, IN 46901  
(765)456-7440 Email: [lmccormack@cityofkokomo.org](mailto:lmccormack@cityofkokomo.org)*

**ATTACHMENT D**  
**COMMITMENT LETTERS FOR LEVERAGING**



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**GREG GOODNIGHT, MAYOR**  
City Hall - 100 South Union Street  
Kokomo, Indiana 46901  
[mayor@cityofkokomo.org](mailto:mayor@cityofkokomo.org)  
(765) 456-7444

January 9, 2014

Mr. Paul Allor  
Department of Development  
Development Specialist  
City of Kokomo  
100 South Unions Street  
Kokomo, Indiana 46901

RE: FY 2014 U.S. EPA Brownfields RLF Application Leveraging Support

Dear Mr. Allor:

As you know, the City of Kokomo is applying for a U.S. Environmental Protection Agency (EPA) Brownfields Revolving Loan Fund (RLF) Grant. As part of the grant application, we understand that the City must leverage additional funds/resources to support the grant projects. We believe that the grant project will benefit the entire City of Kokomo and would like to offer support for the project.

The Department of Development manages the following incentive programs:

- Two RLF programs (Technology and Industry RLF Program and Emerging Business RLF Program) that provide low-interest loans to businesses that wish to expand or relocate in Kokomo.
- Tax increment financing (TIF) program that allows the City to capture tax dollars on new investment and provide these funds to support projects in the TIF districts.
- Tax abatement program that provides abatements on real and personal property taxes for Kokomo businesses.
- Downtown Façade Improvement Loan program that provides owners of downtown buildings with loans to enhance the façade of existing buildings.
- Green Practice Loan program which provides loans to local businesses to install green energy and efficiency projects.

We believe that funds from any and all of these incentive programs could be used, in appropriate locations, to support the actual redevelopment of brownfield sites following remediation. Because the amount of funding that could be contributed to eligible projects depends on the location of the project, the scope of redevelopment, and the amount of funds available, we cannot commit to an exact amount of leveraged funds. However, the department estimates that the funding amounts listed below could be provided, pending Department approval, to support redevelopment of brownfields in Kokomo.

- **Technology and Industry RLF Program** – up to \$300,00 per loan and Emerging Business RLF Program – up to \$15,000 per loan. The applicants to the program will have to meet the loan and business criteria established in the RLF programs
- **TIF program** – up to the amount generated by the new investment associated with the brownfields redevelopment.
- **Tax abatement program** - abatement on taxes for new equipment and real property improvements for up to ten years.
- **Downtown Façade Improvement Loan** – up to \$5,000 per downtown building for façade enhancement.
- **Green Practice Loan** – up to \$5,000 per loan for installation of green and energy efficient products.

We fully supports the City as it seeks an RLF Grant, and look forward to using our incentive programs and funds to support the redevelopment of brownfields in the City.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. R. A.', written in a cursive style.

Mayor Greg Goodnight  
Kokomo, IN



**GREG GOODNIGHT, MAYOR**  
City Hall - 100 South Union Street  
Kokomo, Indiana 46901  
[mayor@cityofkokomo.org](mailto:mayor@cityofkokomo.org)  
(765) 456-7444

January 9, 2014

Mr. Paul Allor  
Department of Development  
Development Specialist  
City of Kokomo  
100 South Unions Street  
Kokomo, Indiana 46901

RE: FY 2014 U.S. EPA Brownfields RLF Application Leveraging Support

Dear Mr. Allor:

As you know, the City of Kokomo is applying for a U.S. Environmental Protection Agency (EPA) Brownfields Revolving Loan Fund (RLF) Grant. As part of the grant application, we understand that the City must leverage additional funds/resources to support the grant projects. We believe that the grant project will benefit the entire City of would like to offer support for the project.

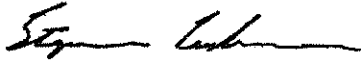
The City has a Community Development Block Grant (CDBG) funds that have been used by the City to provide infrastructure improvements, housing rehabilitation, and demolition and clearance of unsafe structures for low-income neighborhoods in Kokomo. Within this program the department has developed a Neighborhood Blight Removal Program and an Exterior Improvement Program. The Neighborhood Blight Removal Program supports demolition and clearance of unsafe structures, and the Exterior Improvement Program supports renovation of housing in targeted areas. We believe that funds from each of these programs could be used to support residential redevelopment/rehabilitation on and around brownfield sites in the many low-income neighborhoods in the City. Because the amount of funding that could be contributed to eligible projects depends on the location of the project, the scope of redevelopment, and the amount of funds available, we cannot commit to an exact amount of leveraged funds.



However, the department estimates that up to \$5,000 per grant could be provided for demolition of unsafe structures, and up to \$23,000 per loan could be provided for renovation of residential buildings.

We fully support the City as it seeks an RLF Grant, and look forward to using our CDBG programs to support the redevelopment in the City.

Sincerely,

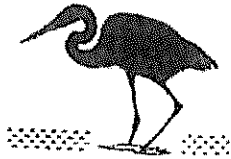
A handwritten signature in black ink, appearing to read "Stephen Whikehart", with a stylized, flowing script.

Stephen Whikehart  
Development Director

**ATTACHMENT E**  
**LETTERS FROM COMMUNITY-BASED ORGANIZATIONS**



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**Wildcat Guardians, Inc.**  
**P.O. Box 6421**  
**Kokomo, IN 46904-6421**

January 21, 2014

Mr. Paul Allor  
Department of Development, City of Kokomo  
100 South Union Street  
Kokomo, Indiana 46901

RE: FY 2014 U.S. EPA Brownfields RLF Application Community Support

Dear Mr. Allor:

The Wildcat Guardians group is a non-profit organization whose mission is to protect and improve the health and beauty of Wildcat Creek. We have divided the creek into sections and monitor each section on a regular basis using our Adopt-a-River program volunteers. This program has resulted in many stream and bank cleanups, and lead to a cleaner and healthier Wildcat Creek. In addition, we report anything unusual (illegal dumping, bank modifications, oil or other contamination, etc.) during our monitoring, we report it to the proper authorities.

We know that the City of Kokomo is applying for a U.S. Environmental Protection Agency (EPA) Brownfields Revolving Loan Fund (RLF) Grant. As part of the grant application, we understand that the City must secure community organization support for the grant program. We believe that the grant project will benefit the entire City and support our mission to improve Wildcat Creek. We would like to offer our support for the project.

The Wildcat Guardians will work with the City of Kokomo to identify brownfields located in and around sensitive natural areas in the region and assist the Coalition in integrating ecological enhancements as part of the remediation and redevelopment of these brownfields. We will also use our education and outreach resources to provide educational programs for residents and businesses on the importance of protecting the unique regional ecosystems and the benefits of reconnecting with the natural world.

Industrial growth and additional land usage requirements will continue to put pressure on Wildcat Creek and its watershed. Wildcat Creek and its surrounding land are sensitive and fragile assets that are valuable to our community and all the people living in the community. It is important that the watershed be protected and preserved, regardless of the demands of future growth. The cleanup and redevelopment of brownfields is essential to support smart growth and sustainable development in Kokomo and along Wildcat Creek.

Sincerely,

Robert Hoshaw, President  
Wildcat Guardians



Jeff Newton • Executive Director

January 20, 2014

Mr. Paul Allor  
Department of Development  
Development Specialist  
City of Kokomo  
100 South Unions Street  
Kokomo, Indiana 46901

RE: FY 2014 U.S. EPA Brownfields RLF Application Community Support

Dear Mr. Allor:

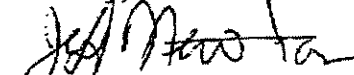
The Kokomo Urban Outreach understands that the City of Kokomo is applying for a U.S. Environmental Protection Agency (EPA) Brownfields Revolving Loan Fund (RLF) Grant. As part of the grant application, we understand that the City must secure community organization support for the grant program. We believe that the grant project will benefit the entire City and support our mission to improve the Kokomo neighborhoods in which we work. We would like to offer our support for the project.

The Kokomo Urban Outreach is a network of churches, individuals, and organizations seeking to improve impoverished Kokomo neighborhoods by providing education for women and children, youth programs, faith-based programs, and developing neighborhood councils. By showing compassion and providing opportunities for personal growth, we witness to our faith as neighbors are stirred to action to take charge of their own neighborhoods, enhancing the quality of life for all residents. We currently work with 26 neighborhoods located throughout Kokomo, including several located in the central and downtown portions of the City.

The Kokomo Urban Outreach believes the RLF grant project offers a perfect opportunity to support cleanup of brownfields in the neighborhoods that have been disproportionately impacted by the presence of vacant and underused industrial and commercial facilities. We will also disseminate information on the availability RLF grant, information on sites selected for cleanup, potential health concerns associated with the selected sites, and results of the cleanup activities. We will work with the City to ensure that residents' concerns regarding health, safety, and community disruption associated with cleanup activities are solicited and addressed during the cleanup and redevelopment process. We will also work to keep the residents and businesses informed on the progress of redevelopment efforts in the neighborhood.

The Kokomo Urban Outreach supports the City as it seeks RLF grant funds and looks forward to working with the City as they begin cleaning up and redeveloping the brownfields that are impacting our impoverished neighborhoods.

Sincerely,

  
Jeff Newton, Executive Director

January 21, 2014

Mr. Paul Allor  
Department of Development  
Development Specialist  
City of Kokomo  
100 South Unions Street  
Kokomo, Indiana 46901

RE: FY 2014 U.S. EPA Brownfields RLF Application Community Support

Dear Mr. Allor:

The Purdue University College of Technology at Kokomo understands that the City of Kokomo is applying for a U.S. Environmental Protection Agency (EPA) Brownfields Revolving Loan Fund (RLF) Grant. As part of the grant application, we understand that the City must secure community organization support for the grant program. We believe that the grant project will benefit the entire City. We would like to offer our support for the project.

The Purdue University College of Technology at Kokomo was established to meet Indiana's needs for college-educated technologists. Representatives from local businesses and industry serve on the Purdue Kokomo Advisory Council and assist with planning, developing, and implementing academic programs. Their participation ensures that graduates meet the needs of North Central Indiana business and industry. Approximately 82% of our College of Technology Statewide graduates continue to work and live in the community after they earn their Purdue degree. In addition to offering various engineering degree programs, Purdue serves as a resource for local businesses and industrial personnel who are updating their skills or who need retraining in technical fields.

Purdue University College of Technology at Kokomo believes that the RLF grant project offers a perfect opportunity for the university to both support the Kokomo community and provide its students with real life experience in community service as well as in the field of environmental engineering and science. We will encourage students and staff to volunteer to participate in on-the-ground community involvement activities (distributing information on sites selected for cleanup, cleanup activities, and redevelopment plans). We will also work to keep students updated on the active RLF cleanup projects so they can pursue potential employment opportunities in the remediation field.



Purdue University College of Technology at Kokomo supports the City as it seeks RLF grant funds and looks forward to working with the City as they begin cleaning up and redeveloping the brownfields that are impacting our community.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Griffin", with a stylized flourish at the end.

Jeff Griffin  
Director/Associate Professor



700 East Firmin Street, Suite 200  
Kokomo, IN 46902  
P 765.457.2000  
F 765.854.0481

January 16, 2014

325 North Main Street  
Kokomo, IN 46901  
P 765.457.5301  
F 765.452.4564

Mr. Paul Allor  
Development Specialist  
Department of Development  
City of Kokomo  
100 South Unions Street  
Kokomo, Indiana 46901

RE: FY 2014 U.S. EPA Brownfields RLF Application Community Support

Dear Mr. Allor:

The Greater Kokomo Chamber is the voice of local businesses in the Kokomo area. The Chamber works to represent and promote Howard County businesses and encourage business/industrial investment in the community. Its programs support economic development throughout Howard County.

We know that the City of Kokomo is applying for a U.S. Environmental Protection Agency (EPA) Brownfields Revolving Loan Fund (RLF) Grant. As part of the grant application, we understand that the City must secure community organization support for the grant program. We believe that the grant project will benefit the entire City and support our mission to attract and maintain businesses in the greater Kokomo area. We would like to offer our support for the project.

The Chamber will assist in identifying brownfields that need to be cleaned up, support redevelopment planning following cleanup, help market remediated brownfields, and inform business and potential developers of the availability of grant funds.

The Chamber fully supports the City of Kokomo as it seeks RLF Grant funds, and looks forward to using our community connections to support the redevelopment of brownfields in Kokomo.

Sincerely,

A handwritten signature in black ink, appearing to read "Jill Evers", is written over a circular stamp that contains the name "Jill Evers".

Jill Evers  
Chamber Council Chair



**Greater Kokomo**  
ECONOMIC DEVELOPMENT ALLIANCE  
**ALIGN. BUILD. CREATE.**

January 17, 2014

Mr. Paul Allor  
Development Specialist  
Department of Development  
City of Kokomo  
100 South Unions Street  
Kokomo, Indiana 46901

700 East Firmin Street, Suite 200  
Kokomo, IN 46902  
P 765.457.2000  
F 765.854.0481

325 North Main Street  
Kokomo, IN 46901  
P 765.457.5301  
F 765.452.4564

RE: FY 2014 U.S. EPA Brownfields RLF Application Community Support

Dear Mr. Allor:

The Greater Kokomo Economic Development Alliance (the Alliance) is a non-profit entity that serves as the comprehensive local economic development agency for Kokomo and Howard County. The Alliance is governed by a Board of Directors from leading local industries, local government, higher education, and health care.

We know that the City of Kokomo is applying for a U.S. Environmental Protection Agency (EPA) Brownfields Revolving Loan Fund (RLF) Grant. As part of the grant application, we understand that the City must secure community organization support for the grant program. We believe that the grant project will benefit the entire City and support our mission to attract business to the area. We would like to offer our support for the project.

As the leading business attraction agency in the County, the Alliance uses its redevelopment experience to provide brownfields redevelopment planning, guidance, and marketing support for brownfields that have been cleaned up using grant funds. The Alliance will also inform existing and potential area businesses of the availability of grant funds for cleanup of brownfields.

The Alliance fully supports the City of Kokomo as it seeks RLF Grant funds, and looks forward to using our economic development strategies and expertise to support the redevelopment of brownfields in Kokomo.

Sincerely,

Christopher L. Hamm  
President/CEO  
Greater Kokomo Economic Development Alliance

[greaterkokomo.com](http://greaterkokomo.com)

**Greater Kokomo**  
CHAMBER OF COMMERCE

**Greater Kokomo**  
DOWNTOWN ASSOCIATION

**Inventrek**  
TECHNOLOGY PARK



**ATTACHMENT F**  
**OTHER FACTORS CHECKLIST**



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### Appendix 3 Other Factors Checklist

Name of Applicant: City of Kokomo, Indiana

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page #
	Community population is 10,000 or less	
	Federally recognized Indian tribe	
	United States territory	
	Applicant will assist a Tribe or territory	
	Targeted brownfield sites are impacted by mine-scarred land	
	Targeted brownfield sites are contaminated with controlled substances	
	Recent natural disaster(s) (2006 or later) occurred within community, causing significant community economic and environmental distress	
NA	Project is primarily focusing on Phase II assessments.	
X	Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation	Page 8 and App. D
X	Community experienced manufacturing plant closure(s) (2008 or later) tied to the targeted brownfield sites or project area, including communities experiencing auto plant closures due to bankruptcy or economic disruptions.	Page 4
	Recent (2008 or later) significant economic disruption (unrelated to a natural disaster or manufacturing/auto plant closure) has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	
	Applicant is a recipient or a core partner of a HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant that is directly tied to the project area, and can demonstrate that funding from a PSC grant has or will benefit the project area. To be considered, <b>applicant must attach documentation</b> which demonstrates this connection to a HUD-DOT-EPA PSC grant.	
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant	
	Community is implementing green remediation plans.	
	Climate Change	